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Attorneys for Defendants
THANDI ENTERPRISES, LLC and
METRO HOSPITALITY SERVICES, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JANE DOE,

Plaintiff,

v.

WYNDHAM HOTEL & RESORTS, INC.;
THANDI ENTERPRISES, L.L.C.; CAL
TEX HOSPITALITY, L.L.C; METRO
HOSPITALITY SERVICES, INC.; RED ROOF
INNS, INC.; OCEANIC FRESNO, L.P.;
VAGABOND INN CORPORATION;
BOOTA SINGH CHARIL, as an individual
trustee of CHARIL FAMILY) TRUST; KULDIP
KAUR CHARIL, as an individual trustee of
CHARIL FAMILY TRUST; KANTILAL B.
PATEL, as an individual trustee of PATEL KB &
I K LIVING TRUST; INDIRABEN K PATEL, as
an individual trustee of PATEL KB & I K LIVING
TRUST; MADHUBEN K. PATEL, an individual;
JAGRATI D. BHAKTA, an individual; ROGER
BHAKTA, an individual; and ROES 1-200,
inclusive,

Defendants

Defendant.

Case No. 1:25-CV-00026-JLT-BAM

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS THANDI
ENTERPRISES, LLC, METRO
HOSPITALITY SERVICES, INC. TO
FILE A RESPONSIVE PLEADING**

ORDER

Plaintiff JANE DOE ("Plaintiff") and Defendants METRO HOSPITALITY SERVICES, INC., and THANDI ENTERPRISES LLC (collectively, "Defendants"), by and through their respective counsel, hereby stipulate and agree as follows:

1 1. METRO HOSPITALITY SERVICES, INC. (“Metro”), and THANDI
2 ENTERPRISES LLC (“Thandi”) were served with the summons and complaint in this matter.
3 At this time, Metro and Thandi have retained Sharon Collier and Nicholas R. O’Brien-Kovari
4 of Freeman Mathis & Gary LLP to represent them in this lawsuit. Metro and Thandi are
5 seeking additional time to allow new counsel to file a responsive pleading.

6 2. The parties agree that there is good cause to extend Defendants' time to respond
7 to the complaint to March 10, 2025, to allow sufficient time for Defendants and their new
8 counsel to prepare their response.

9 3. The requested extension will not unduly delay these proceedings and is made in
10 the interest of judicial efficiency.


11 Accordingly, the parties stipulate and respectfully request that the Court enter an order
12 permitting Defendants METRO HOSPITALITY SERVICES, INC., and THANDI
13 ENTERPRISES LLC to file a responsive pleading on or before March 10, 2025.

14 **IT IS SO STIPULATED.**

15
16 Dated: February 27, 2025

SINGLETON SCHREIBER, LLP

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18 By:

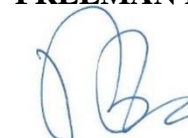


MEAGAN VERSCHUEREN
KATIE LLAMAS
Attorneys for Plaintiff JANE DOE

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20
21
22 Dated: February 27, 2025

FREEMAN MATHIS & GARY, LLP

23
24 By:



SHARON C. COLLIER
NICK O'BRIEN-KOVARI
Attorneys for Defendants
THANDI ENTERPRISES, LLC and
METRO HOSPITALITY SERVICES, INC.

ORDER

Having reviewed the stipulation submitted by Plaintiff JANE DOE and Defendants METRO HOSPITALITY SERVICES, INC., and THANDI ENTERPRISES LLC, and for good cause shown, IT IS HEREBY ORDERED:

1. Defendants METRO HOSPITALITY SERVICES, INC., and THANDI ENTERPRISES LLC shall file their responsive pleading(s) on or before March 10, 2025.

2. This extension is granted based on the stipulation submitted by Plaintiff JANE DOE and Defendants METRO HOSPITALITY SERVICES, INC., and THANDI ENTERPRISES LLC, and the finding of good cause, given Defendants' counsel was recently retained and the extension will not unduly delay these proceedings.

IT IS SO ORDERED.

Dated: **February 27, 2025**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE